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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

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TAMMI J. JOHNSON,)
)
Plaintiff,) CASE NO.
) 2:24-cv-01156-EJY
v.)
) UNOPPOSED MOTION
) FOR EXTENSION OF TIME TO FILE
MARTIN O'MALLEY,) PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)
)
Defendant.)
)

16 Plaintiff, Tammi J. Johnson, by her attorney, moves for a thirty-two (32) day extension of
17 time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed October
18 21, 2024.

20 Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel
21 requires additional time to prepare Plaintiff's brief properly and thoroughly. For instance,
22 between September 6, and October 18, 2024, staff in Counsel's office have one hundred and
23 eight (108) Plaintiff briefs due. This figure does not include briefings which will be due after the
24 filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit
25 Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout
26 the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly
27
28

1 prepare the brief by the current deadline. This request will not cause Defendant any undue
2 hardship. This extension is needed to prepare the brief thoroughly and properly.
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4 Wherefore, Plaintiff requests an extension from September 19, 2024, up to and including
5 October 21, 2024, to file her brief. Counsel for the Plaintiff has conferred with Defendant's
6 Counsel who has no objection to this request.

7 Dated September 12, 2024.

8 Respectfully submitted,

9
10 /s/Hal Taylor
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18 IT IS SO ORDERED.
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20 
21 U.S. Magistrate Judge

22 Date: September 13, 2024
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